

December 11, 1997

Richard Baldwin, Air Pollution Control Officer
Ventura County Air Pollution Control District
669 County Square Drive
Ventura, CA 93003

Re: Proposed Title V Permits: Tenby Inc. Proposed Permit No. 0012
Chevron Proposed Permit No. 1494

Dear Mr. Baldwin:

I am writing to confirm the resolution of the issues raised in EPA's September 12, 1997 letter to you. In that letter, EPA formally objected, pursuant to our authority under 40 Code of Federal Regulations ("CFR") §70.8(c) (see also District Rule 33.7.C.3 and 33.7.D), to the issuance of both proposed permits on the basis that they did not fully meet the periodic monitoring requirements of §70.6(a)(3)(i). In response to this letter, Ventura County Air Pollution Control District (Ventura) submitted a November 20, 1997 response and per our subsequent discussions, submitted additional documentation on December 8 and December 10. Based on the November 20 letter and the additional documentation, EPA agrees that the issues have been substantially addressed, and that Ventura may issue the proposed permits as modified in the November 20 submittal and Attachment 71.1N6 of the December 10 submittal.

However, we request that prior to issuance of the permits, monitoring be added for internal combustion engines firing diesel fuel if these engines operate for more than 200 hours per year, in order to assure compliance for the particulate matter limits in Rule 57.B. Ventura's December 8 submittal contained a demonstration that violation of the 0.1 grain/dscf emission limit in rule 57.B. is unlikely is based on a comparison of the emission limit to other emissions information. For diesel engines less than 600 hp, the demonstration is based on a single source test. This demonstration is not adequate, because particulate emissions from internal combustion engines can vary widely, so data from a single source test is not representative. Additionally, the data from the source test showed emissions right at the emission limit, therefore this does not demonstrate that violations are unlikely.

In templates developed for diesel-fired internal combustion engines in San Joaquin Valley, periodic source testing is required for units operating more than 200 hours per year.

These templates require testing every two years if the initial source test results are 0.06 grains/dscf or higher, and otherwise require source testing every five years. We request that Ventura use this or a similar approach that assures compliance with Rule 57.B.

I would like to thank you and your staff for all your help during our review of your submittal. If you have any questions, please contact Matt Haber at (415) 744-1254.

Sincerely,

David P. Howekamp
Director
Air Division

cc: Karl Krause, Ventura APCD
Kerby Zozula, Ventura APCD
Ray Menebroker, ARB
Morley Chase, Tenby Inc.
Gary Steinbach, Chevron